

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT NEW YORK

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RITCHIE CAPITAL MANAGEMENT LLC,)
RITCHIE RISK-LINKED STRATEGIES)
TRADING (IRELAND), LIMITED, RITCHIE)
RISK-LINKED STRATEGIES TRADING)
(IRELAND) II, LIMITED, WALKERS SPV)
LIMITED, as trustee for Ritchie Risk-Linked) Civil Action No. 07CV3494 (DLC) (DCF)
Life Strategies Trust I and Ritchie Life Strategies)
Master Trust, and RITCHIE RISK-LINKED) (ECF)
STRATEGIES TRADING, LTD.,)
)
Plaintiffs,)
)
v.)
)
COVENTRY FIRST LLC, THE COVENTRY)
GROUP, INC., MONTGOMERY CAPITAL, INC.,))
LST I LLC, ALAN BUERGER, CONSTANCE)
BUERGER, REID S. BUERGER, ANTONIO)
MUNIZ, ALEX SELDIN, NEAL JACOBS,)
EILEEN SHOVLIN, and JIM DODARO,)
)
Defendants.)
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**AFFIDAVIT OF GEORGE A. BORDEN IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS AND TO STRIKE JURY DEMAND**

DISTRICT OF COLUMBIA) ss:

GEORGE A. BORDEN, being duly sworn, states:

1. I am over 18 years of age and a member of the law firm of Williams & Connolly LLP, counsel to Plaintiffs in the above-captioned matter. I am duly licensed to practice in the District of Columbia and the State of New York and admitted to practice before this Court. I submit this affidavit in support of Defendants' Motion to Dismiss and to Strike Jury Demand.

2. Attached as Exhibit I to this affidavit is a true and correct copy of the Master Policy Purchase Agreement ("MPPA") by and between LST I LLC, as Seller, and Ritchie Risk-Linked Strategies Trading (Ireland), Ltd., as Purchaser, dated June 30, 2005.

3. Attached as Exhibit 2 to this affidavit is a true and correct copy of the Amended and Restated MPPA by and between LST I LLC, as Seller, and Ritchie Risk-Linked Strategies Trading (Ireland), Ltd., as Purchaser, dated September 8, 2005.

4. Attached as Exhibit 3 to this affidavit is a true and correct copy of the First Amendment to Amended and Restated MPPA by and among LST I LLC, as Seller, Ritchie Risk-Linked Strategies Trading (Ireland), Ltd., as Purchaser, and ABN Amro Bank N.V., as Senior Noteholder, dated January 31, 2006.

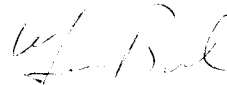
5. Attached as Exhibit 4 to this affidavit is a true and correct copy of the Master Policy Purchase Agreement ("MPPA") by and between LST I LLC, as Seller, and Ritchie Risk-Linked Strategies Trading (Ireland) II, Ltd., as Purchaser, dated December 15, 2005.

6. Attached as Exhibit 5 to this affidavit is a true and correct copy of the Master Policy Purchase Agreement ("MPPA") by and between LST I LLC, as Seller, and Ritchie Risk-Linked Strategies Trading (Ireland) IV, Ltd., as Purchaser, dated June 30, 2006.

7. Attached as Exhibit 6 to this affidavit is a true and correct copy of the Amended and Restated Intercreditor Agreement among Ritchie Risk-Linked Strategies Trading (Ireland), Ltd. *et al.*, dated September 8, 2005.


8. Attached as Exhibit 7 to this affidavit is a true and correct copy of the Amendment to Amended and Restated Intercreditor Agreement among Ritchie Risk-Linked Strategies Trading (Ireland), Ltd. *et al.*, dated January 29, 2007.

Executed on May 29, 2007



George A. Borden

The foregoing instrument was acknowledged before me on this 29th day of May, 2007.



Notary Public
SHARON L. BROWN
Notary Public, District of Columbia
My Commission Expires July 14, 2009